



State of Utah

SPENCER J. COX  
*Governor*

DEIDRE HENDERSON  
*Lieutenant Governor*

Department of  
Environmental Quality

Kimberly D. Shelley  
*Executive Director*

DIVISION OF AIR QUALITY  
Bryce C. Bird  
*Director*

11767

**Title V Operating Permit**

**PERMIT NUMBER:** 2100036005 -DRAFT

**DATE OF PERMIT:** TBD

Date of Last Revision: TBD

This Operating Permit is issued to, and applies to the following:

**Name of Permittee:**

Genpak LLC  
2791 West Highway 56  
Cedar City, UT 84720

**Permitted Location:**

Polystyrene Foam Production Facilities  
2791 West Highway 56  
Cedar City, UT 84720

UTM coordinates: 314,760 m Easting, 4,172,580 m Northing  
SIC code: 3086 (Plastics Foam Products)

By:

\_\_\_\_\_  
Bryce C. Bird, Director

Prepared By:

Brandy Cannon  
bcannon@utah.gov

## **ENFORCEABLE DATES AND TIMELINES**

The following dates or timeframes are referenced in  
Section I: General Provisions of this permit.

Annual Certification Due:	April 15 and on that date of every calendar year that this permit is in force.
Renewal application due:	TBD
Permit expiration date:	TBD
Definition of “prompt”:	written notification within 14 days.

### **ABSTRACT**

Genpak LLC is located in Cedar City, Iron County, Utah, an attainment area for all regulated air pollutants. Genpak manufactures food grade containers including polystyrene foam containers. Polystyrene pellets are sent through extruders where a nucleating agent and a blowing agent are added. The sheets from the extruders are thermoformed and cut to produce the final product. The scrap foam from the process gets reground, recycled, and repelletized to be mixed with virgin material and extruded. Genpak is a major source of VOCs.

## OPERATING PERMIT HISTORY

Permit/Activity	Date Issued	Recorded Changes
Title V renewal application (Project #OPP0117670013)	TBD	Changes: Revision includes updates to the equipment list, typographical corrections, and language updates to various conditions for consistency and clarity.
Title V renewal application (Project #OPP0117670012)	02/12/2020	Changes: Permit renewal
Title V significant modification (Project #OPP0117670011)	07/10/2019	Changes: Incorporate DAQE-AN117670014-18. Adding equipment to GPW and GPE Building of several grinders, extruders, and process silos.
Title V renewal application (Project #OPP0117670009)	04/03/2015	Changes: Permit renewal
Title V administrative amendment - enhanced AO (Project #OPP0117670008)	10/30/2014	Changes: Addition of Genpak East (GPE) manufacturing facility and addition of a new "Cup Line" to the existing manufacturing building Genpak West (GPW).
Title V administrative amendment - enhanced AO (Project #OPP0117670005)	05/04/2012	Changes: Replacement in kind of the thermal oxidizer with new operating conditions
Title V renewal application (Project #OPP0117670003)	04/05/2010	Changes: Renewal.
Title V administrative amendment by source (Project #OPP0117670002)	01/04/2002	Changes: Genpak submitted an NOI for a staged facility expansion in May 2001. An enhanced NSR AO was issued on Dec. 18th 2001 that included 3 new extruder lines and a thermal oxidizer. DAQE-1028-01 replaced DAQE-185-00. The issuance of this new AO triggered this permit modification.
Title V initial application (Project #OPP0117670001)	05/23/2000	Initial Issue

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**Issued under authority of Utah Code Ann. Section 19-2-104 and 19-2-109.1, and in accordance with Utah Administrative Code R307-415 Operating Permit Requirements.**

All definitions, terms and abbreviations used in this permit conform to those used in Utah Administrative Code R307-101 and R307-415 (Rules), and 40 Code of Federal Regulations (CFR), except as otherwise defined in this permit. Unless noted otherwise, references cited in the permit conditions refer to the Rules.

Where a permit condition in Section I, General Provisions, partially recites or summarizes an applicable rule, the full text of the applicable portion of the rule shall govern interpretations of the requirements of the rule. In the case of a conflict between the Rules and the permit terms and conditions of Section II, Special Provisions, the permit terms and conditions of Section II shall govern except as noted in Provision I.M, Permit Shield.

## **SECTION I: GENERAL PROVISIONS**

### **I.A Federal Enforcement.**

All terms and conditions in this permit, including those provisions designed to limit the potential to emit, are enforceable by the EPA and citizens under the Clean Air Act of 1990 (CAA) except those terms and conditions that are specifically designated as "State Requirements". (R307-415-6b)

### **I.B Permitted Activity(ies).**

Except as provided in R307-415-7b(1), the permittee may not operate except in compliance with this permit. (See also Provision I.E, Application Shield)

### **I.C Duty to Comply.**

I.C.1 The permittee must comply with all conditions of the operating permit. Any permit noncompliance constitutes a violation of the Air Conservation Act and is grounds for any of the following: enforcement action; permit termination; revocation and reissuance; modification; or denial of a permit renewal application. (R307-415-6a(6)(a))

I.C.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (R307-415-6a(6)(b))

I.C.3 The permittee shall furnish to the Director, within a reasonable time, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director copies of records required to be kept by this permit or, for information claimed to be confidential, the permittee may furnish such records directly to the EPA along with a claim of confidentiality. (R307-415-6a(6)(e))

I.C.4 This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance shall not stay any permit condition, except as provided under R307-415-7f(1) for minor permit modifications. (R307-415-6a(6)(c))

I.D **Permit Expiration and Renewal.**

I.D.1 This permit is issued for a fixed term of five years and expires on the date shown under "Enforceable Dates and Timelines" at the front of this permit. (R307-415-6a(2))

I.D.2 Application for renewal of this permit is due on or before the date shown under "Enforceable Dates and Timelines" at the front of this permit. An application may be submitted early for any reason. (R307-415-5a(1)(c))

I.D.3 An application for renewal submitted after the due date listed in I.D.2 above shall be accepted for processing, but shall not be considered a timely application and shall not relieve the permittee of any enforcement actions resulting from submitting a late application. (R307-415-5a(5))

I.D.4 Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted consistent with R307-415-7b (see also Provision I.E, Application Shield) and R307-415-5a(1)(c) (see also Provision I.D.2). (R307-415-7c(2))

I.E **Application Shield.**

If the permittee submits a timely and complete application for renewal, the permittee's failure to have an operating permit will not be a violation of R307-415, until the Director takes final action on the permit renewal application. In such case, the terms and conditions of this permit shall remain in force until permit renewal or denial. This protection shall cease to apply if, subsequent to the completeness determination required pursuant to R307-415-7a(3), and as required by R307-415-5a(2), the applicant fails to submit by the deadline specified in writing by the Director any additional information identified as being needed to process the application. (R307-415-7b(2))

I.F **Severability.**

In the event of a challenge to any portion of this permit, or if any portion of this permit is held invalid, the remaining permit conditions remain valid and in force. (R307-415-6a(5))

I.G **Permit Fee.**

I.G.1 The permittee shall pay an annual emission fee to the Director consistent with R307-415-9. (R307-415-6a(7))

I.G.2 The emission fee shall be due on October 1 of each calendar year or 45 days after the source receives notice of the amount of the fee, whichever is later. (R307-415-9(4)(a))

I.H **No Property Rights.**

This permit does not convey any property rights of any sort, or any exclusive privilege. (R307-415-6a(6)(d))

I.I **Revision Exception.**

No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (R307-415-6a(8))

I.J **Inspection and Entry.**

- I.J.1 Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director or an authorized representative to perform any of the following:
  - I.J.1.a Enter upon the permittee's premises where the source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit. (R307-415-6c(2)(a))
  - I.J.1.b Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit. (R307-415-6c(2)(b))
  - I.J.1.c Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practice, or operation regulated or required under this permit. (R307-415-6c(2)(c))
  - I.J.1.d Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements. (R307-415-6c(2)(d))
- I.J.2 Any claims of confidentiality made on the information obtained during an inspection shall be made pursuant to Utah Code Ann. Section 19-1-306. (R307-415-6c(2)(e))

I.K **Certification.**

Any application form, report, or compliance certification submitted pursuant to this permit shall contain certification as to its truth, accuracy, and completeness, by a responsible official as defined in R307-415-3. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (R307-415-5d)

I.L **Compliance Certification.**

- I.L.1 Permittee shall submit to the Director an annual compliance certification, certifying compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall be submitted no later than the date shown under "Enforceable Dates and Timelines" at the front of this permit, and that date each year following until this permit expires. The certification shall include all the following (permittee may cross-reference this permit or previous reports): (R307-415-6c(5))
  - I.L.1.a The identification of each term or condition of this permit that is the basis of the certification;
  - I.L.1.b The identification of the methods or other means used by the permittee for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the monitoring and related recordkeeping and reporting requirements in this permit. If necessary, the permittee also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information;
  - I.L.1.c The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means

designated in Provision I.L.1.b. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and

I.L.1.d Such other facts as the Director may require to determine the compliance status.

I.L.2 The permittee shall also submit all compliance certifications to the EPA, Region VIII, at the following address or to such other address as may be required by the Director: (R307-415-6c(5)(d))

Environmental Protection Agency, Region VIII  
Office of Enforcement, Compliance and Environmental Justice  
(mail code 8ENF)  
1595 Wynkoop Street  
Denver, CO 80202-1129

I.M **Permit Shield.**

I.M.1 Compliance with the provisions of this permit shall be deemed compliance with any applicable requirements as of the date of this permit, provided that:

I.M.1.a Such applicable requirements are included and are specifically identified in this permit, or (R307-415-6f(1)(a))

I.M.1.b Those requirements not applicable to the source are specifically identified and listed in this permit. (R307-415-6f(1)(b))

I.M.2 Nothing in this permit shall alter or affect any of the following:

I.M.2.a The emergency provisions of Utah Code Ann. Section 19-1-202 and Section 19-2-112, and the provisions of the CAA Section 303. (R307-415-6f(3)(a))

I.M.2.b The liability of the owner or operator of the source for any violation of applicable requirements under Utah Code Ann. Section 19-2-107(2)(a)(xiii) and Section 19-2-110 prior to or at the time of issuance of this permit. (R307-415-6f(3)(b))

I.M.2.c The applicable requirements of the Acid Rain Program, consistent with the CAA Section 408(a). (R307-415-6f(3)(c))

I.M.2.d The ability of the Director to obtain information from the source under Utah Code Ann. Section 19-2-120, and the ability of the EPA to obtain information from the source under the CAA Section 114. (R307-415-6f(3)(d))

I.N **Reserved.**

I.O **Operational Flexibility.**

Operational flexibility is governed by R307-415-7d(1).

I.P **Off-permit Changes.**

Off-permit changes are governed by R307-415-7d(2).

I.Q            **Administrative Permit Amendments.**

Administrative permit amendments are governed by R307-415-7e.

I.R            **Permit Modifications.**

Permit modifications are governed by R307-415-7f.

I.S            **Records and Reporting.**

I.S.1            Records.

I.S.1.a            The records of all required monitoring data and support information shall be retained by the permittee for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-charts or appropriate recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. (R307-415-6a(3)(b)(ii))

I.S.1.b            For all monitoring requirements described in Section II, Special Provisions, the source shall record the following information, where applicable: (R307-415-6a(3)(b)(i))

I.S.1.b.1            The date, place as defined in this permit, and time of sampling or measurement.

I.S.1.b.2            The date analyses were performed.

I.S.1.b.3            The company or entity that performed the analyses.

I.S.1.b.4            The analytical techniques or methods used.

I.S.1.b.5            The results of such analyses.

I.S.1.b.6            The operating conditions as existing at the time of sampling or measurement.

I.S.1.c            Additional record keeping requirements, if any, are described in Section II, Special Provisions.

I.S.2            Reports.

I.S.2.a            Monitoring reports shall be submitted to the Director every six months, or more frequently if specified in Section II. All instances of deviation from permit requirements shall be clearly identified in the reports. (R307-415-6a(3)(c)(i))

I.S.2.b            All reports submitted pursuant to Provision I.S.2.a shall be certified by a responsible official in accordance with Provision I.K of this permit. (R307-415-6a(3)(c)(i))

I.S.2.c            The Director shall be notified promptly of any deviations from permit requirements including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventative

measures taken. Prompt, as used in this condition, shall be defined as written notification within the number of days shown under "Enforceable Dates and Timelines" at the front of this permit. Deviations from permit requirements due to breakdowns shall be reported in accordance with the provisions of R307-107. (R307-415-6a(3)(c)(ii))

I.S.3 Notification Addresses.

I.S.3.a All reports, notifications, or other submissions required by this permit to be submitted to the Director are to be sent to the following address or to such other address as may be required by the Director:

Utah Division of Air Quality  
P.O. Box 144820  
Salt Lake City, UT 84114-4820  
Phone: 801-536-4000

I.S.3.b All reports, notifications or other submissions required by this permit to be submitted to the EPA should be sent to one of the following addresses or to such other address as may be required by the Director:

For annual compliance certifications:

Environmental Protection Agency, Region VIII  
Office of Enforcement, Compliance and Environmental Justice  
(mail code 8ENF)  
1595 Wynkoop Street  
Denver, CO 80202-1129

For reports, notifications, or other correspondence related to permit modifications, applications, etc.:

Environmental Protection Agency, Region VIII  
Air Permitting and Monitoring Branch (mail code 8ARD-PM)  
1595 Wynkoop Street  
Denver, CO 80202-1129  
Phone: 303-312-7015

I.T **Reopening for Cause.**

I.T.1 A permit shall be reopened and revised under any of the following circumstances:

I.T.1.a New applicable requirements become applicable to the permittee and there is a remaining permit term of three or more years. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the terms and conditions of this permit have been extended pursuant to R307-415-7c(3), application shield. (R307-415-7g(1)(a))

I.T.1.b The Director or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit. (R307-415-7g(1)(c))

- I.T.1.c EPA or the Director determines that this permit must be revised or revoked to assure compliance with applicable requirements. (R307-415-7g(1)(d))
- I.T.1.d Additional applicable requirements are to become effective before the renewal date of this permit and are in conflict with existing permit conditions. (R307-415-7g(1)(e))
- I.T.2 Additional requirements, including excess emissions requirements, become applicable to a Title IV affected source under the Acid Rain Program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into this permit. (R307-415-7g(1)(b))
- I.T.3 Proceedings to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. (R307-415-7g(2))

I.U **Inventory Requirements.**

An emission inventory shall be submitted in accordance with the procedures of R307-150, Emission Inventories. (R307-150)

I.V **Title IV and Other, More Stringent Requirements**

Where an applicable requirement is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, Acid Deposition Control, both provisions shall be incorporated into this permit. (R307-415-6a(1)(b))

## **SECTION II: SPECIAL PROVISIONS**

- II.A **Emission Unit(s) Permitted to Discharge Air Contaminants.**  
(R307-415-4(3)(a) and R307-415-4(4))
- II.A.1 **Permitted Source**  
Source-wide
- II.A.2 **GPW Building - Polystyrene Foam Extruder Lines**  
Six extrusion lines, two extruders on each line. Designated as emission unit S-1a and b, S-2a and b, and S-3a and b. Powered by electricity only. No unit specific applicable requirements.
- II.A.3 **GPW Building – Fifteen (15) Storage Silos**  
Twelve "fluff" storage silos with baghouses/bin vents (recycled polystyrene pellets and recycled scrap) and three storage silos with bin vents (virgin polystyrene pellets). Designated as emission units S-5a thru S-5p.
- II.A.4 **GPW Building - Isopentane Storage Tank**  
Approximately 30,000 gallon storage tank for Isopentane which is used as a blowing agent. Designated as emission unit S-9. No unit specific applicable requirements.
- II.A.5 **GPW Building - Thermal Oxidizer**  
This is a 2-canister regenerative thermal oxidizer. It controls process streams from the two repelletizers (S-7a and b) and the two white fluff silos (S-5o and S-5p). Designated as unit S-8. Minimum 5000 SCFM, natural gas fired only.
- II.A.6 **GPW Building - Butane Storage Tank**  
Approximately 7,125 gallon storage tank for Butane which is used as a blowing agent. Designated as emission unit S-10. No unit specific applicable requirements.
- II.A.7 **GPW Building - Isopentane and Butane Vapor Recovery System**  
During transfer to storage tanks, vapors are passed back to the rail tank to prevent gaseous emissions to the atmosphere. Designated as emission unit S-10. No unit specific applicable requirements.
- II.A.8 **GPW Building – Two 6" Scrap Repelletizer Units**  
Scrap material is melted and repelletized for use as recycled material. Designated as emission unit S-7a and S-7b. No unit specific applicable requirements.
- II.A.9 **GPW Building - Comfort heaters**  
Various heaters each with rated capacity less than 5 MMBtu/hr. The total maximum capacity from all heaters is less than 9 MMBtu/hour. Equipped to burn natural gas only. Designated as emission unit heaters. No unit specific applicable requirements.
- II.A.10 **GPW Building - Cup Plant - Small Heating Units**  
Two Direct fired make-up air/heating units with a max rating of 1.0 MMBtu/hr each. Four direct fired make-up air/heating units with a max rating of 15,000 Btu/hr each. Natural gas fired only. No unit specific applicable requirements.
- II.A.11 **GPW Building - Cup Plant - Pellet Silos**  
Two Exterior virgin silos with polypropylene pellets. One Exterior virgin silo with polystyrene pellets. One Interior virgin silo with polystyrene/calcium carbonate hybrid pellets. . None of these silos exhaust to the atmosphere. No unit specific applicable requirements.

II.A.12 **GPW Building - Electric Thermoformers**  
No unit specific applicable requirements.

II.A.13 **GPW Building - Grinders**  
Seventeen grinders. Eleven rated at 750 lbs/hr and six rated at 1500 lbs/hr. Grinders are exhausted to either interior or exterior silos controlled via baghouse.

II.B **Requirements and Limitations**

The following emission limitations, standards, and operational limitations apply to the permitted facility as indicated:

II.B.1 **Conditions on permitted source (Source-wide).**

II.B.1.a **Condition:**

A Risk Management Plan (RMP) developed in accordance with 40 CFR Part 68 shall be submitted to the United States Environmental Protection Agency no later than the applicable date in 40 CFR 68.10(a). [Origin: 40 CFR 68]. [40 CFR 68]

II.B.1.a.1 **Monitoring:**

Records required for this permit condition will serve as monitoring.

II.B.1.a.2 **Recordkeeping:**

A copy of the Risk Management Plan shall be available to the Director upon request. Records shall be maintained as described in Provision I.S.1 of this permit.

II.B.1.a.3 **Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.b **Condition:**

At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate any permitted plant equipment, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [Origin: DAQE-AN117670014-18]. [R307-401-8(2)]

II.B.1.b.1 **Monitoring:**

Records required for this permit condition will serve as monitoring.

II.B.1.b.2 **Recordkeeping:**

Permittee shall document activities performed to assure proper operation and maintenance. Records shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.1.b.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.c

**Condition:**

Source-wide emissions of Non-HAP VOCs shall not exceed 191.92 tons per rolling 12-month period. This includes the VOC emissions resulting from up to 10 days of maintenance and repair time during which the thermal oxidizer may be inoperable. [Origin: DAQE-AN117670014-18]. [R307-401-8]

II.B.1.c.1

**Monitoring:**

Records required for this permit condition will serve as monitoring.

II.B.1.c.2

**Recordkeeping:**

The source-wide emissions of Non-HAP VOCs emitted to the atmosphere shall be determined by maintaining a record of Non-HAP VOC potential contained in materials used each month. The record shall include the following data for each item used:

The amount of blowing agent Non-HAP VOC emitted shall be calculated as 37.4% of the total isopentane and butane used. Calculation of emissions from the thermal oxidizer shall include 80% of emissions from the two repelletizer lines (S-7a and S-7b) and the vents from two white fluff silos (S-5o and S-5p) and apply a destruction efficiency of 98.5%.

Compliance with the limitation shall be demonstrated on a rolling 12-month total. By the twentieth day of each month, a new 12-month total shall be calculated using data from the previous 12 months.

Records of consumption of Non-HAP VOCs shall be kept for all periods of operation. Records shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.1.c.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.d

**Condition:**

Visible emissions shall be no greater than 20 percent opacity unless otherwise specified in this permit. [Origin: DAQE-AN117670014-18]. [R307-201-3, R307-205-4, R307-401-8]

II.B.1.d.1

**Monitoring:**

A visual opacity survey of each affected emission unit shall be performed on a monthly basis by an individual trained on the observation procedures of 40 CFR 60, Appendix A, Method 9, or other EPA-approved testing method, as acceptable to the Director. If visible emissions other than condensed water vapor are observed from an emission unit, an opacity determination of that emission unit shall be performed by a certified observer within 24 hours of the initial survey. The opacity determination shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, or other EPA-approved testing method, as acceptable to the Director, for point sources, and in accordance 40 CFR 51, Appendix M, Method 203A, or other EPA-approved testing method, as acceptable to the Director, for fugitive sources.

II.B.1.d.2

**Recordkeeping:**

A log of the visual opacity survey(s) shall be maintained in accordance with Provision I.S.1 of this permit. If an opacity determination is indicated, a notation of the determination will be made in the log. All data required by 40 CFR 60, Appendix A, Method 9 or 40 CFR 51, Appendix M, Method 203A, or other EPA-approved testing method, as acceptable to the Director, shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.1.d.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.e

**Condition:**

The permittee shall comply with the applicable requirements for recycling and emission reduction for class I and class II refrigerants pursuant to 40 CFR 82, Subpart F - Recycling and Emissions Reduction. [Origin: 40 CFR 82]. [40 CFR 82.150(b)]

II.B.1.e.1

**Monitoring:**

The permittee shall certify, in the annual compliance statement required in Section I of this permit, its compliance status with the requirements of 40 CFR 82, Subpart F.

II.B.1.e.2

**Recordkeeping:**

All records required in 40 CFR 82, Subpart F shall be maintained consistent with the requirements of Provision S.1 in Section I of this permit.

II.B.1.e.3

**Reporting:**

All reports required in 40 CFR 82, Subpart F shall be submitted as required. There are no additional reporting requirements except as outlined in Section I of this permit.

II.B.1.f

**Condition:**

The permittee shall comply with the applicable requirements for servicing of motor vehicle air conditioners pursuant to 40 CFR 82, Subpart B - Servicing of Motor Vehicle Air Conditioners. [Origin: 40 CFR 82]. [40 CFR 82.30(b)]

II.B.1.f.1

**Monitoring:**

The permittee shall certify, in the annual compliance statement required in Section I of this permit, its compliance status with the requirements of 40 CFR 82, Subpart B.

II.B.1.f.2

**Recordkeeping:**

All records required in 40 CFR 82, Subpart B shall be maintained consistent with the requirements of Provision S.1 in Section I of this permit.

II.B.1.f.3

**Reporting:**

All reports required in 40 CFR 82, Subpart B shall be submitted as required. There are no additional reporting requirements except as outlined in Section I of this permit.

II.B.1.g

**Condition:**

Visible emissions shall be no greater than 10 percent opacity from each natural gas fuel combustion exhaust point. [Origin: DAQE-AN117670014-18]. [R307-401-8]

II.B.1.g.1

**Monitoring:**

Records required for this permit condition will serve as monitoring.

II.B.1.g.2

**Recordkeeping:**

In lieu of visible emissions observations, records of fuel usage shall be maintained consistent with the requirements of Provision I.S.1 of this permit to demonstrate that only natural gas is being burned.

II.B.1.g.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.h

**Condition:**

If materials are deposited that may create fugitive dust on a public or private paved road, the permittee shall clean the road promptly. [Origin: R307-205-6]. [R307-205-6]

II.B.1.h.1

**Monitoring:**

Records required for this permit condition will serve as monitoring.

II.B.1.h.2

**Recordkeeping:**

Records of measures taken to minimize fugitive dust shall be maintained. Records demonstrating compliance with this condition shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.1.h.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.2

**Conditions on GPW Building – Fifteen (15) Storage Silos.**

II.B.2.a

**Condition:**

Visible emissions shall be no greater than 10 percent opacity from each baghouse/silo emission point. [Origin: DAQE-AN117670014-18]. [R307-401-8]

II.B.2.a.1

**Monitoring:**

A visual opacity survey of each affected emission unit shall be performed on a monthly basis by an individual trained on the observation procedures of 40 CFR 60, Appendix A, Method 9, or other EPA-approved testing method, as acceptable to the Director. If visible emissions other than condensed water vapor are observed from an emission unit, an opacity determination of that emission unit shall be performed by a certified observer within 24 hours of the initial survey. The opacity determination shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, or other EPA-approved testing method, as acceptable to the Director.

II.B.2.a.2

**Recordkeeping:**

A log of the visual opacity survey(s) shall be maintained in accordance with Provision I.S.1 of this permit. If an opacity determination is indicated, a notation of the determination will be made in the log. All data required by 40 CFR 60, Appendix A, Method 9, or other EPA-approved testing method, as acceptable to the Director, shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.2.a.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.3

**Conditions on GPW Building - Thermal Oxidizer.**

II.B.3.a

**Condition:**

Operating temperature shall be no less than 1,360 degrees F. [Origin: DAQE-AN117670014-18]. [R307-401-8]

II.B.3.a.1

**Monitoring:**

The operating temperature shall be continuously monitored and recorded. The monitoring equipment shall be located such that an inspector can at any time safely read the output. All instruments shall be calibrated against a certified primary standard at least once a year.

II.B.3.a.2

**Recordkeeping:**

Records of monitoring and calibration shall be maintained as described in Provision I.S.1 of this permit.

II.B.3.a.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.3.b

**Condition:**

At all times emissions of VOC from the thermal oxidizer exhaust stack shall not exceed 1.05 lb/hr. [Origin: DAQE-AN117670014-18]. [R307-401-8]

**Monitoring:**

- (a) Stack testing shall be performed as specified below:
  - (1) Testing and Frequency. Emissions shall be tested within 12 months of the permit issuance date. Thereafter, emissions shall be tested every three years based on the date of the most recent stack test. The permittee shall conduct testing according to the approved source test protocol and according to the test conditions contained in R307-165-4. If the Director has reason to believe that an applicable emission limitation is being exceeded, the permittee shall perform such stack testing as is necessary to determine the actual compliance status and as required by the Director.
  - (2) Notification. At least 30 days before conducting the test, the source shall notify the Director of the date, time, and place of testing and provide a copy of the source test protocol. The source shall obtain approval of the protocol from the Director prior to conducting the test(s). The source test protocol shall include the items contained in R307-165-3. The permittee shall attend a pretest conference if determined necessary by the Director.
  - (3) Methods.
    - (A) Sample Location - the emission point shall conform to the requirements of 40 CFR 60, Appendix A, Method 1, and Occupational Safety and Health Administration (OSHA) approved access shall be provided to the test location.
    - (B) 40 CFR 60, Appendix A, Method 25, 25A, or other EPA-approved testing method, as acceptable to the Director, shall be used to determine the volatile organic compounds emission rate.
    - (C) 40 CFR 60, Appendix A, Method 2, or other EPA-approved testing method, as acceptable to the Director, shall be used to determine the volumetric flow rate.
  - (4) Calculations. To determine mass emission rates (lb/hr, etc.) the pollutant concentration as determined by the appropriate methods above shall be multiplied by the volumetric flow rate and any necessary conversion factors determined by the Director to give the results in the specified units of the emission limitation.
- (b) The permittee shall monitor the thermal oxidizer temperature and work practices as indicators to provide reasonable assurance of compliance with the VOC emission limitation.
  - (1) Measurement Approach
    - (A) Primary Indicator: The permittee shall continuously measure the chamber temperature in the thermal oxidizer using a thermocouple.
    - (B) Secondary Indicator: The permittee shall follow good work practices, including daily inspections of the chart recorder, weekly inspections of the thermal oxidizer, including the chart recorder and replacement of the circular chart, and annual inspections of the thermal oxidizer in accordance with the manufacturer's recommendations.
  - (2) Indicator Range: Excursions are defined as follows. Each excursion triggers an inspection, corrective action, and a reporting requirement.
    - (A) Primary Indicator: An excursion is defined as an average hourly chamber temperature less than 1,410 degrees F.
    - (B) Secondary Indicator: An excursion is defined as a failure to perform the work practices specified in condition II.B.3.b.1(b)(1)(B): daily, weekly, annual inspections, or replacement of the circular chart.
  - (3) Performance Criteria
    - (A) Data Representativeness:
      - i. Primary Indicator: The thermal oxidizer temperature shall be measured using a thermocouple located in the oxidizer chamber. The minimum tolerance of the thermocouple is  $\pm 10.5^\circ$  F or  $\pm 0.75\%$ . The minimum chart recorder sensitivity (minor division) is  $20^\circ$  F or as approved by the Director.
      - ii. Secondary Indicator: Not applicable.

- (B) QA/QC Practices and Criteria: The accuracy of the thermocouple shall be verified annually by a third party supplier with the calibration performed according to the manufacturer's recommendation.
- (C) Monitoring Frequency:
  - i. Primary Indicator: The chamber temperature in the thermal oxidizer shall be measured continuously.
  - ii. Secondary Indicator: The permittee shall perform a daily inspection of the temperature chart recorder, weekly inspections of the thermal oxidizer, including the chart recorder and replacement of the circular chart, and annual inspections of the thermal oxidizer in accordance with the manufacturer's recommendations.
- (D) Data Collection Procedure:
  - i. Primary Indicator: Chamber temperature shall be continuously recorded on a circular chart recorder. An hourly average temperature shall be calculated during each hour of operation and shall be recorded for comparison to the excursion level.
  - ii. Secondary Indicator: Results of the daily, weekly, and annual inspections shall be recorded. Additionally, the permittee shall keep records of any preventive maintenance in the thermal oxidizer log book.
- (E) Averaging Period:
  - i. Primary Indicator: 1 hour block average.
  - ii. Secondary Indicator: Not Applicable
- (c) During each stack test required in (a) above, the permittee shall acquire new test data to evaluate or update the indicator range and excursion level for the indicators. Any resultant changes to the monitoring shall be addressed in accordance with 40 CFR 64.7(e).

### II.B.3.b.2

#### **Recordkeeping:**

- (a) Results of all stack testing shall be recorded and maintained in accordance with the associated test method and Provision I.S.1 of this permit. The permittee shall maintain records of test data from the most recent stack test and any calculations used to establish, evaluate, or revise the indicators, indicator ranges and excursion levels.
- (b) The permittee shall maintain a file of continuous monitor measurements, including performance testing measurements, all performance evaluations, all calibration checks, all adjustments, and maintenance.
- (c) The permittee shall maintain a file of the occurrence and duration of any excursion, corrective actions taken, and any other supporting information required to be maintained under 40 CFR 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

Records and results of monitoring shall be maintained in accordance with 40 CFR 64.9(b) and Provision I.S.1 of this permit.

### II.B.3.b.3

#### **Reporting:**

- (a) Monitoring reports shall include, at a minimum, the following information, as applicable:
  - (1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;(40 CFR 64.9(a)(2)(i))
  - (2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable). (40 CFR 64.9(a)(2)(ii))
- (b) A written report of the results of stack testing shall be submitted to the Director within 60 days of completion of the testing. Reports shall clearly identify results as compared to permit limits and indicate compliance status. Reports shall include validated results and supporting

information. Reports shall include test data and any calculations used to evaluate or revise the indicator ranges and excursion levels as specified in II.B.3.b.1(c).

There are no additional reporting requirements for this provision except those specified in Section I of this permit.

**II.B.3.c Condition:**

Visible emissions shall be no greater than 10 percent opacity. [Origin: DAQE-AN117670014-18]. [R307-401-8]

**II.B.3.c.1 Monitoring:**

A visual opacity survey of each affected emission unit shall be performed on a monthly basis by an individual trained on the observation procedures of 40 CFR 60, Appendix A, Method 9, or other EPA-approved testing method, as acceptable to the Director. If visible emissions other than condensed water vapor are observed from an emission unit, an opacity determination of that emission unit shall be performed by a certified observer within 24 hours of the initial survey. The opacity determination shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, or other EPA-approved testing method, as acceptable to the Director.

**II.B.3.c.2 Recordkeeping:**

A log of the visual opacity survey(s) shall be maintained in accordance with Provision I.S.1 of this permit. If an opacity determination is indicated, a notation of the determination will be made in the log. All data required by 40 CFR 60, Appendix A, Method 9, or other EPA-approved testing method, as acceptable to the Director, shall be maintained in accordance with the requirements of Provision I.S.1 of this permit.

**II.B.3.c.3 Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

**II.B.4 Condition on GPW Building – Grinders.**

**II.B.4.a Condition:**

Visible emission shall be no greater than 10 percent opacity from exterior baghouse/silo emission points. [Origin: DAQE-AN117670014-18]. [R307-401-8]

**II.B.4.a.1 Monitoring:**

A visual opacity survey of each affected emission unit shall be performed on a monthly basis by an individual trained on the observation procedures of 40 CFR 60, Appendix A, Method 9, or other EPA-approved testing method, as acceptable to the Director. If visible emissions other than condensed water vapor are observed from an emission unit, an opacity determination of that emission unit shall be performed by a certified observer within 24 hours of the initial survey. The opacity determination shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, or other EPA-approved testing method, as acceptable to the Director.

II.B.4.a.2

**Recordkeeping:**

A log of the visual opacity survey(s) shall be maintained in accordance with Provision I.S.1 of this permit. If an opacity determination is indicated, a notation of the determination will be made in the log. All data required by 40 CFR 60, Appendix A, Method 9, or other EPA-approved testing method, as acceptable to the Director, shall be maintained in accordance with the requirements of Provision I.S.1 of this permit.

II.B.4.a.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.C

**Emissions Trading**  
(R307-415-6a(10))

Not applicable to this source.

II.D

**Alternative Operating Scenarios.**  
(R307-415-6a(9))

Not applicable to this source.

### **SECTION III: PERMIT SHIELD**

A permit shield was not granted for any specific requirements.

### **SECTION IV: ACID RAIN PROVISIONS**

**This source is not subject to Title IV. This section is not applicable.**

## REVIEWER COMMENTS

This operating permit incorporates all applicable requirements contained in the following documents:

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Incorporates	DAQE-AN117670014-18 dated August 24, 2018
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1. Comment on an item originating in 40 CFR Part 64 regarding GPW Building - Thermal Oxidizer Compliance Assurance Monitoring (CAM) applicability: CAM applies to the thermal oxidizer and was originally included in the 2010 renewal permit. Language updates were made in the 2024 renewal permit for consistency and clarity. [12/2/2009] [Last updated November 18, 2024]
  
2. Comment on an item originating in DAQE-AN117670014-18 regarding Permitted Source Approval order condition II.B.1.c: It appears condition language was changed from recordkeeping required for monitoring contained in the approval order to recordkeeping required to show compliance with a limit. Since the recordkeeping contained in the referenced approval order condition is equivalent to the minimum recordkeeping required for monitoring contained in I.S.1.b of this permit, the approval order language in II.B.1.c has not been incorporated in the operating permit. The current and previous iterations of approval order condition II.B.1.c are listed below for reference.

Condition II.B.1.c in the referenced approval order reads, “To show compliance with this limit, the owner/operator shall record the following information, where applicable: the date, place as defined in this permit, and time of sampling or measurement, the date analyses were performed, the company or entity that performed the analyses, the analytical techniques or methods used, the results of such analyses, the operating conditions as existing at the time of sampling or measurement.”

Condition II.B.1.c in historical approval order DAQE-AN117670008-12 read, “For all monitoring requirements the source shall record the following information, where applicable: the date, place as defined in this permit, and time of sampling or measurement, the date analyses were performed, the company or entity that performed the analyses, the analytical techniques or methods used, the results of such analyses, the operating conditions as existing at the time of sampling or measurement.”

[12/10/2018] [Last updated November 18, 2024]

3. Comment on an item originating in DAQE-AN117670014-18 regarding Permitted Source  
The permittee requested removal of the following equipment in the 2024 renewal application.

GPW Building - Cup Plant Small Heating Units (II.A.10)

Three Direct fired make-up/heating units

Two HVAC units (Emission Units: Htr #1, Htr #2)

Five Rim Roasters (Emission Units: RR #1, RR #2, RR #3, RR #4, RR #5)

Three cup pre-treatment heating units (Emission Units: PT #1, PT #2, PT #3)

GPW Building - Cup Plant Pellet Silos (II.A.11)

Three interior scrap fluff silos

GPW Building - Cup Plant Extruders (II.A.12; Emission Units: D100, D140, E100)

GPW Building - Cup Plant Thermoformers (II.A.13; Emission Units: F86, F87)

GPW Building - Cup Plant Printers (II.A.14)

GPE Building - Extruders (II.A.17)  
GPE Building - Grinder (II.A.18)  
GPE Building - Scrap Silos (II.A.19)  
GPE Building - Fluff Silos (II.A.20)  
GPE Building - PET Silos (II.A.21)  
GPE Building - PET Dryer (II.A.22)  
GPE Building - Natural Gas Heaters (II.A.23; Emission Units: AH1 -AH26)  
GPE Building - Thermoformers (II.A.24)  
GPE Building - Crystallizer (II.A.25)  
GPE Building - Scrap Dryer (II.A.26)

Although this equipment is currently permitted in the referenced approval order, it has been removed from the site. Any future operation of the equipment, would require a new source review action followed by an operating permit modification. The approval order will be corrected at the next revision. [9/18/2024] [Last updated November 18, 2024]